

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ANDREA BARTZ, ANDREA BARTZ, INC., ) Case No.: 3:24-cv-05417-AMO  
CHARLES GRAEBER, KIRK WALLACE )  
JOHNSON, and MJ + KJ, INC., individually ) **SUPPLEMENTAL DECLARATION OF**  
and on behalf of others similarly situated, ) **JENNIFER M. KEOUGH REGARDING**  
 ) **PASSMAN FILING**  
Plaintiffs, )  
 )  
v. )  
 )  
ANTHROPIC PBC, )  
 )  
Defendants. )

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am Chief Executive Officer, President, and Co-Founder of JND Legal Administration (“JND”). I have more than 20 years of legal experience creating and supervising notice and claims administration programs, and have personally overseen well over 1,000 matters. I oversee this matter personally as well. I am regularly called upon to submit declarations in connection with JND’s notice and administration work.

2. This Declaration is intended to supplement my previous Declaration regarding Notice Administration, filed September 5, 2025 (“Initial Keough Declaration”), my Supplemental

Declaration, filed September 22, 2025, my Second Supplemental Declaration, filed November 19, 2025, and my Third Supplemental Declaration filed March 19, 2026. I submit this Declaration based on my personal knowledge, as well as upon information provided to me by experienced JND employees and Counsel for the Plaintiffs and Defendants.

3. Class action notice programs approved by courts nationwide do not require proof of receipt or confirmed delivery of direct notice. Rather, the standard is whether the notice program was reasonably calculated to reach class members. In many cases, courts approve notice programs that rely in whole or in part on media and publication notice to satisfy due process. Further, the FJC's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* considers a Notice Plan with a 70%–95% reach effective. Based on the reach methodology described in the Supplemental Keough Declaration, the Tier 1 digital effort alone reached 95% or more of the copyright holder population and therefore likely Class Members. The direct notice efforts, Tier 2 Trade/Niche Media, Tier 3 Reminder Phases, press release distribution, and earned media extended reach and notice exposure further. The Notice Program was designed to, and did, effectively reach as many Settlement Class Members as possible and provided them with the opportunity to review a plain language notice with the ability to easily take the next steps to learn more about the Settlement.

4. Pursuant to the Notice Program approved by the Court, JND sent multiple rounds of direct notice to potential Class Members, including Donald Passman. Specifically, JND mailed the complete Court-ordered Long Form Notice and buck slip on December 1, 2025, a reminder postcard notice on March 9, 2026, and a nonfiling claimant notice on April 29, 2026. All three notices were mailed to 132 S. Rodeo Dr., Beverly Hills, CA 90212-2415 and not returned as undeliverable.

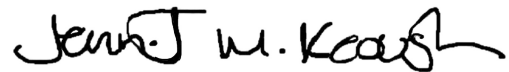
5. In accordance with the Plan of Allocation and Distribution, JND also issued notices on a rolling basis to nonfiling claimants advising them that another rightsholder filed a claim on account of their work. JND sent these notices using all available contact information for a Class

Member, including any new contact details provided in the filed claim. These notices were sent via email where available; otherwise the notice was sent via mail.

6. To maximize notice to potential rightsholders, JND included any works where the Class Member name matched a potential rightsholder, as identified by either the claimant or the Works List. As such, Donald Passman was notified both of his works and of one additional work by a different individual with the same name. As evidence that our broad noticing strategy was successful, the Donald Passman who wrote *The Algebraic Structure of Group Rings* filed a claim for that work on May 19, 2026, after receiving a Nonfiling Claimant Notice.

7. I declare under the penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on July 10, 2026 at Seattle, Washington.

A handwritten signature in black ink, reading "Jennifer M. Keough". The signature is written in a cursive, flowing style. The first name "Jennifer" is written with a large, stylized "J". The middle initial "M." is written in a smaller, more formal script. The last name "Keough" is written with a large, stylized "K" and a long, sweeping tail that extends to the right.

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JENNIFER M. KEOUGH